

interview, post-interview) of the application process.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

Oracle incorporates by reference its Objections to Specific Definitions set forth above. Oracle maintains its objections to this request on the grounds that it is overbroad in scope, unduly burdensome, oppressive, and encompassing documents not relevant to any party's claim or defense nor proportional to the needs of the case.

Subject to and without waiving these objections, Oracle responds:

Oracle will produce responsive, non-privileged documents in its possession, custody or control for the PT1 job group at Oracle's Redwood Shores, CA, location during the ALJ Relevant Period.

REQUEST FOR PRODUCTION NO. 17:

All DOCUMENTS and COMMUNICATIONS exchanged between YOU and all domestic colleges and universities relating to HIRING COLLEGE RECRUITS during the RELEVANT TIME PERIOD. This includes all DOCUMENTS and COMMUNICATIONS exchanged between YOU and college and university career services, AFFINITY GROUPS, and any other organizations whose members include college and university students and alumni.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

Oracle incorporates by reference its Objections to Specific Definitions set forth above. Oracle maintains its objections to this request on the grounds that it is vague and ambiguous, including but not limited to the phrases "career services," and "any other organizations." Oracle further objects to this request as overbroad in scope, unduly burdensome, oppressive, and encompassing documents not relevant to any party's claim or defense nor proportional to the needs of the case.

When Oracle served its Initial Responses, it indicated that subject to and without waiving its objections it was, after conducting a reasonably diligent search and utilizing reasonable search parameters, willing to produce responsive, non-privileged documents related to the PT1 group

from the period of January 1, 2013 through June 30, 2014. However, given the initial state of the litigation, Oracle did not have a full understanding at that time of the incredible burden associated with searching for and reviewing all of the many thousands of emails that are potentially related to this request. Since its Initial Responses, Oracle has gained a greater appreciation for the incredibly burdensome nature of this request, and now that Judge Larsen's forthcoming ruling on the relevant period has the potential to dramatically increase the pool of documents for Oracle's search and review process, that burden will only magnify. Moreover, the Amended Complaint makes clear that OFCCP's findings of discrimination are based upon statistical analyses it claims to have conducted based on applicant, hire and compensation data submitted by Oracle in the compliance review. OFCCP has not demonstrated the documents and emails sought in this request are relevant to those claims, let alone shown the documents and emails are more relevant, and not cumulative and duplicative of, the massive amounts of material OFCCP already gathered from Oracle in the underlying compliance review. *See* Fed. R. Civ. P. 26(b)(2)(C) (providing that discovery should be limited to the extent that it is "unreasonably cumulative or duplicative, or can be obtained from some other source that is more convenient, less burdensome or less expensive").

Although it objects to this request for the reasons stated above, Oracle is willing to continue the meet and confer process with OFCCP to determine how to respond to this request in a manner that is consistent with and proportionate to the needs of the case, including but not limited to Oracle potentially producing responsive documents from a reasonably limited sample period of time within the ALJ Relevant Period.

REQUEST FOR PRODUCTION NO. 18:

All DOCUMENTS and COMMUNICATIONS exchanged between YOU and any internal or external recruiter for YOU relating to HIRING COLLEGE RECRUITS during the RELEVANT TIME PERIOD.

DEF. ORACLE AMERICA, INC.'S AMENDED & SUPPLEMENTAL RESPONSES TO REQUEST FOR PRODUCTION OF
DOCUMENTS
CASE NO. 2017-OFC-00006

RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

Oracle incorporates by reference its Objections to Specific Definitions set forth above. As discussed during the meet and confer process, Oracle maintains its objections to this request as overbroad in scope, unduly burdensome, oppressive, and encompassing documents not relevant to any party's claim or defense nor proportional to the needs of the case.

When Oracle served its Initial Responses, it indicated that subject to and without waiving its objections it was, after conducting a reasonably diligent search and utilizing reasonable search parameters, willing to produce responsive, non-privileged documents related to the PTI group from the period of January 1, 2013 through June 30, 2014. However, given the initial state of the litigation, Oracle did not have a full understanding at that time of the incredible burden associated with searching for and reviewing all of the many thousands of emails that are potentially related to this request. Since its Initial Responses, Oracle has gained a greater appreciation for the incredibly burdensome nature of this request, and now that Judge Larsen's forthcoming ruling on the relevant period has the potential to dramatically increase the pool of documents for Oracle's search and review process, that burden will only magnify. Moreover, the Amended Complaint makes clear that OFCCP's findings of discrimination are based upon statistical analyses it claims to have conducted based on applicant, hire and compensation data submitted by Oracle in the compliance review. OFCCP has not demonstrated the documents and emails sought in this request are relevant to those claims, let alone shown the documents and emails are more relevant, and not cumulative and duplicative of, the massive amounts of material OFCCP already gathered from Oracle in the underlying compliance review. *See* Fed. R. Civ. P. 26(b)(2)(C) (providing that discovery should be limited to the extent that it is "unreasonably cumulative or duplicative, or can be obtained from some other source that is more convenient, less burdensome or less expensive").

Although it objects to this request for the reasons stated above, Oracle is willing to continue the meet and confer process with OFCCP to determine how to respond to this request in

a manner that is consistent with and proportionate to the needs of the case, including but not limited to Oracle potentially producing responsive documents from a reasonably limited sample period of time within the ALJ Relevant Period.

REQUEST FOR PRODUCTION NO. 19:

All DOCUMENTS and COMMUNICATIONS exchanged between YOU and all international colleges and universities relating to HIRING COLLEGE RECRUITS during the RELEVANT TIME PERIOD. This includes all DOCUMENTS and COMMUNICATIONS exchanged between YOU and college and university career services, AFFINITY GROUPS, and any other organizations whose members include college and university students and alumni.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

Oracle incorporates by reference its Objections to Specific Definitions set forth above. Oracle maintains its objections to this request on the grounds that it is vague and ambiguous, including but not limited to the phrases "all international colleges and universities," "career services," and "any other organizations." Oracle further objects to this request as overbroad in scope, unduly burdensome, oppressive, and encompassing documents not relevant to any party's claim or defense nor proportional to the needs of the case.

Subject to and without waiving these objections, Oracle responds:

Oracle will, after conducting a reasonably diligent search and utilizing reasonable search parameters, produce responsive, non-privileged documents in its possession, custody or control for the PT1 job group at Oracle's Redwood Shores, CA, location during the ALJ Relevant Period.

REQUEST FOR PRODUCTION NO. 20:

All DOCUMENTS and COMMUNICATIONS relating to "Good Faith Efforts (GFEs) in the U.S. to reach out to interested women and minorities" for any PT1 job group positions and all positions within the Product Development line of business during the RELEVANT TIME PERIOD, as stated in YOUR letter to OFCCP dated October 31, 2016.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

Oracle incorporates by reference its Objections to Specific Definitions set forth above. Following its meet and confer conversations with OFCCP, Oracle maintains its objections that this request mischaracterizes its October 31, 2016 letter as the quoted language is taken out of context and refers only to PT1 job group positions and not Product Development. Oracle further objects to this request as overbroad in scope, unduly burdensome, and oppressive, and encompassing documents not relevant to any party's claim or defense nor proportional to the needs of the case. Oracle further objects to this request to the extent it seeks information protected by the attorney-client privilege or the attorney work product doctrine.

Subject to and without waiving these objections, Oracle responds:

Oracle will, after conducting a reasonably diligent search and utilizing reasonable search parameters, produce responsive, non-privileged documents in its possession, custody or control for the PT1 job group at Oracle's Redwood Shores, CA, location during the ALJ Relevant Period.

REQUEST FOR PRODUCTION NO. 21:

All DOCUMENTS and COMMUNICATIONS relating to efforts to recruit PERSONS internationally for any PT1 job group positions and all positions within the Product Development line of business during the RELEVANT TIME PERIOD.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

Oracle incorporates by reference its Objections to Specific Definitions set forth above. Following its meet and confer conversations with OFCCP, Oracle maintains its objections to this request on the grounds that it is vague and ambiguous, including but not limited to the term "recruit". Oracle further objects to this request as overbroad in scope, unduly burdensome, oppressive, and encompassing documents not relevant to any party's claim or defense nor proportional to the needs of the case.

Subject to and without waiving these objections, Oracle responds:

Oracle will, after conducting a reasonably diligent search and utilizing reasonable search parameters, produce responsive, non-privileged documents in its possession, custody or control for the PT1 job group at Oracle's Redwood Shores, CA, location during the ALJ Relevant Period.

REQUEST FOR PRODUCTION NO. 22:

All notes or records of interviews, whether by phone or in-person (including but not limited to memos, emails, and text messages), of COLLEGE RECRUITS who were interviewed during the RELEVANT TIME PERIOD.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

Oracle incorporates by reference its Objections to Specific Definitions set forth above. Following its meet and confer conversations with OFCCP, Oracle maintains its objections to this request on the grounds that it is vague and ambiguous, including but not limited to the terms "notes" and "records." Oracle further objects to this request as overbroad in scope, unduly burdensome, oppressive, and encompassing documents not relevant to any party's claim or defense nor proportional to the needs of the case.

When Oracle served its Initial Responses, it indicated that subject to and without waiving its objections it was, after conducting a reasonably diligent search and utilizing reasonable search parameters, willing to produce responsive, non-privileged documents related to the PT1 group from the period of January 1, 2013 through June 30, 2014. However, given the initial state of the litigation, Oracle did not have a full understanding at that time of the incredible burden associated with searching for and reviewing all of the many thousands of emails that are potentially related to this request. Since its Initial Responses, Oracle has gained a greater appreciation for the incredibly burdensome nature of this request, and now that Judge Larsen's forthcoming ruling on the relevant period has the potential to dramatically increase the pool of documents for Oracle's search and review process, that burden will only magnify. Moreover, the Amended Complaint makes clear that OFCCP's findings of discrimination are based upon

statistical analyses it claims to have conducted based on applicant, hire and compensation data submitted by Oracle in the compliance review. OFCCP has not demonstrated the documents sought in this request are relevant to those claims, let alone shown the documents are more relevant, and not cumulative and duplicative of, the massive amounts of material OFCCP already gathered from Oracle in the underlying compliance review. *See* Fed. R. Civ. P. 26(b)(2)(C) (providing that discovery should be limited to the extent that it is “unreasonably cumulative or duplicative, or can be obtained from some other source that is more convenient, less burdensome or less expensive”).

Although it objects to this request for the reasons stated above, Oracle is willing to continue the meet and confer process with OFCCP to determine how to respond to this request in a manner that is consistent with and proportionate to the needs of the case, including but not limited to Oracle potentially producing responsive documents from a reasonably limited sample period of time and a reasonably limited number of affected persons within the ALJ Relevant Period.

REQUEST FOR PRODUCTION NO. 23:

All DOCUMENTS and COMMUNICATIONS (including but not limited to memos, emails, text messages) stating, summarizing, supporting, or explaining YOUR decision on a disposition of an expression of interest or application at any point of the HIRING process from a COLLEGE RECRUIT during the RELEVANT TIME PERIOD.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

Oracle incorporates by reference its Objections to Specific Definitions set forth above. During its meet and confer conversations with OFCCP, Oracle received no clarification or modification to this request, and Oracle maintains its objections to this request on the grounds that it is vague and ambiguous, including but not limited to the terms “disposition” and “application” as well as the phrase “expression of interest.” Oracle further objects to this request as overbroad in scope, unduly burdensome, oppressive, and encompassing documents not

relevant to any party's claim or defense nor proportional to the needs of the case. Oracle further objects to this request to the extent it seeks information protected by the attorney-client privilege or the attorney work product doctrine.

Subject to and without waiving these objections, Oracle responds:

Oracle will, after conducting a reasonably diligent search and utilizing reasonable search parameters, produce responsive, non-privileged documents in its possession, custody or control for the PT1 job group at Oracle's Redwood Shores, CA, location during the ALJ Relevant Period.

REQUEST FOR PRODUCTION NO. 24:

All COMMUNICATIONS (including but not limited to memos, emails and text messages) to and from Larry Lynn, Vice President, College Recruiting, relating to HIRING COLLEGE RECRUITS during the RELEVANT TIME PERIOD.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

Oracle incorporates by reference its Objections to Specific Definitions set forth above. During the meet and confer process, Oracle explained its overbreadth and relevance objections and requested that OFCCP narrow or clarify this request. OFCCP provided no meaningful guidance and implied that virtually all of Mr. Lynn's communications should be produced.¹ OFCCP also declined to engage in any meaningful discussion of reasonable search terms Oracle could use to limit this request to documents relevant to this litigation. Accordingly, Oracle maintains its objections to this request as overbroad in scope, unduly burdensome, oppressive, and encompassing documents not relevant to any party's claim or defense nor proportional to the needs of the case. Oracle further objects to this request to the extent it seeks information protected by the attorney-client privilege or the attorney work product doctrine.

As Oracle explained to OFCCP during the meet and confer process, Oracle has collected

¹ During the meet and confer process, when asked to provide examples of documents that would not be considered responsive to Request for Production Nos. 24 and 25, OFCCP gave the examples of "scheduling a drink" or an email about "going to a bar," but provided no other examples or criteria.

over 61,000 emails from Larry Lynn alone and, of those emails, around 46,000 date from January 1, 2013, to the present. While OFCCP's request ostensibly limits the documents to be produced from this set to only those "related to HIRING COLLEGE RECRUITS," in practice, it does very little to narrow the scope of this burdensome and disproportionate request. Mr. Lynn is Oracle's Vice President in charge of hiring college recruits, and it stands to reason that a very significant percentage of his email and other correspondence is related in some way to hiring college recruits. As noted above, requests that seek "all communications" or "all email" from a party and/or individual without any meaningful limitations are disfavored.

When Oracle served its Initial Responses, it indicated that subject to and without waiving its objections it was, after conducting a reasonably diligent search and utilizing reasonable search parameters, willing to produce responsive, non-privileged documents related to the PT1 group from the period of January 1, 2013 through June 30, 2014. However, given the initial state of the litigation, Oracle did not have a full understanding at that time of the incredible burden associated with searching for and reviewing all of the many thousands of emails that are potentially related to this request. Since its Initial Responses, Oracle has gained a greater appreciation for the incredibly burdensome nature of this request, and now that Judge Larsen's forthcoming ruling on the relevant period has the potential to dramatically increase the pool of documents for Oracle's search and review process, that burden will only magnify. Moreover, the Amended Complaint makes clear that OFCCP's findings of discrimination are based upon statistical analyses it claims to have conducted based on applicant, hire and compensation data submitted by Oracle in the compliance review. OFCCP has not demonstrated the emails sought in this request are relevant to those claims, let alone shown the emails are more relevant, and not cumulative and duplicative of, the massive amounts of material OFCCP already gathered from Oracle in the underlying compliance review. *See* Fed. R. Civ. P. 26(b)(2)(C) (providing that discovery should be limited to the extent that it is "unreasonably cumulative or duplicative, or can be obtained from some other source that is more convenient, less burdensome or less

expensive”).

Although it objects to this request for the reasons stated above, Oracle is willing to continue the meet and confer process with OFCCP to determine how to respond to this request in a manner that is consistent with and proportionate to the needs of the case, including but not limited to Oracle potentially producing responsive documents from a reasonably limited sample period of time within the ALJ Relevant Period.

REQUEST FOR PRODUCTION NO. 25:

All COMMUNICATIONS (including but not limited to memos, emails and text messages) to and from Chantal Dumont, Senior Director, College Recruiting, relating to HIRING COLLEGE RECRUITS during the RELEVANT TIME PERIOD.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25:

Oracle incorporates by reference its Objections to Specific Definitions set forth above. Similar to Request for Production No. 24, Oracle explained its overbreadth and relevance objections to OFCCP during the meet and confer process. OFCCP provided no meaningful guidance and implied that virtually all of Ms. Dumont’s communications should be produced. OFCCP also declined to engage in any meaningful discussion of reasonable search terms Oracle could use to limit this request to documents relevant to this litigation. Accordingly, Oracle maintains its objections to this request as overbroad in scope, unduly burdensome, oppressive, and encompassing documents not relevant to any party’s claim or defense nor proportional to the needs of the case. Oracle further objects to this request to the extent it seeks information protected by the attorney-client privilege or the attorney work product doctrine.

As Oracle explained during the meet and confer process, Oracle has collected over 41,000 emails from Ms. Dumont that date from January 1, 2013, to the present. Oracle objects to this request for the same reasons set forth in its objections to Request for Production No. 24; while OFCCP’s request ostensibly limits the documents to be produced from this set to only those “related to HIRING COLLEGE RECRUITS,” in practice, it does very little to narrow the

scope of this burdensome and disproportionate request because Ms. Dumont is Oracle's Senior Director in charge of hiring college recruits.

When Oracle served its Initial Responses, it indicated that subject to and without waiving its objections it was, after conducting a reasonably diligent search and utilizing reasonable search parameters, was willing to produce responsive, non-privileged documents related to the PT1 group from the period of January 1, 2013 through June 30, 2014. However, given the initial state of the litigation, Oracle did not have a full understanding at that time of the incredible burden associated with searching for and reviewing all of the many thousands of emails that are potentially related to this request. Since its Initial Responses, Oracle has gained a greater appreciation for the incredibly burdensome nature of this request, and now that Judge Larsen's forthcoming ruling on the relevant period has the potential to dramatically increase the pool of documents for Oracle's search and review process, that burden will only magnify. Moreover, the Amended Complaint makes clear that OFCCP's findings of discrimination are based upon statistical analyses it claims to have conducted based on applicant, hire and compensation data submitted by Oracle in the compliance review. OFCCP has not demonstrated the emails sought in this request are relevant to those claims, let alone shown the emails are more relevant, and not cumulative and duplicative of, the massive amounts of material OFCCP already gathered from Oracle in the underlying compliance review. *See* Fed. R. Civ. P. 26(b)(2)(C) (providing that discovery should be limited to the extent that it is "unreasonably cumulative or duplicative, or can be obtained from some other source that is more convenient, less burdensome or less expensive").

Although it objects to this request for the reasons stated above, Oracle is willing to continue the meet and confer process with OFCCP to determine how to respond to this request in a manner that is consistent with and proportionate to the needs of the case, including but not limited to Oracle potentially producing responsive documents from a reasonably limited sample period of time within the ALJ Relevant Period.

REQUEST FOR PRODUCTION NO. 26:

All DOCUMENTS and COMMUNICATIONS relating to POLICIES, PRACTICES, or PROCEDURES for YOUR Employee Referral Program.

RESPONSE TO REQUEST FOR PRODUCTION NO. 26:

Oracle incorporates by reference its Objections to Specific Definitions set forth above. Oracle further objects to this request on the grounds that it is vague and ambiguous. Oracle further objects to this request as overbroad in scope, unduly burdensome, oppressive, and encompassing documents not relevant to any party's claim or defense nor proportional to the needs of the case. Oracle further objects to this request to the extent it seeks information protected by the attorney-client privilege or the attorney work product doctrine.

Subject to and without waiving these objections, Oracle responds:

Oracle will, after conducting a reasonably diligent search and utilizing reasonable search parameters, produce responsive, non-privileged policies, practices, and procedures for its Employee Referral Program that are in its possession, custody or control for the PTI job group at Oracle's Redwood Shores, CA, location during the ALJ Relevant Period.

REQUEST FOR PRODUCTION NO. 27:

All DOCUMENTS and COMMUNICATIONS relating to PERSONS who were referred under YOUR Employee Referral Program.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

Oracle incorporates by reference its Objections to Specific Definitions set forth above. Due to OFCCP's lack of clarification or limitation, Oracle maintains its objections to this request on the grounds that it is vague and ambiguous, including but not limited to the phrase "Employee Referral Program." Oracle further objects to this request as overbroad in scope, unduly burdensome, oppressive, and seeks information that is not relevant to any party's claim or defense nor proportional to the needs of the case. Oracle further objects to this request to the extent it seeks information protected by the attorney-client privilege or the attorney work product

doctrine.

During Oracle's meet and confer calls with OFCCP on both May 24 and May 30, 2017, Oracle explained its objections to this request. Oracle explained that this request is overbroad and should be limited to the PT1 group and by relevant time period. OFCCP initially agreed to provide a new written request that would at least address the relevant time period. To date, OFCCP has not narrowed this request in writing. Accordingly, Oracle maintains its objections and asks again that OFCCP narrows this request and also provide greater specificity regarding what documents it seeks given that the request potentially calls for any and all documents related to an employee who became employed as a result of a referral. If, through this request, OFCCP is actually soliciting data exports, as opposed to documents, related to the individuals who were referred, Oracle requests the amended request make that clear.

REQUEST FOR PRODUCTION NO. 28:

All DOCUMENTS and COMMUNICATIONS relating to PERSONS receiving a bonus or other form of COMPENSATION through YOUR Employee Referral Program.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

Oracle incorporates by reference its Objections to Specific Definitions set forth above. Due to OFCCP's lack of clarification or limitation, Oracle maintains its objections to this request on the grounds that it is vague and ambiguous, including but not limited to the phrase "Employee Referral Program." Oracle further objects to this request as overbroad in scope, unduly burdensome, oppressive, and seeks information that is not relevant to any party's claim or defense nor proportional to the needs of the case. Oracle further objects to this request to the extent it seeks information protected by the attorney-client privilege or the attorney work product doctrine.

During Oracle's meet and confer calls with OFCCP on both May 24 and May 30, 2017, Oracle explained its objections to this request. Oracle explained that this request is overbroad and should be limited to the PT1 group and by relevant time period. OFCCP initially agreed to

provide a new written request that would at least address the relevant time period. To date, OFCCP has not narrowed this request in writing. Accordingly, Oracle maintains its objections and asks that OFCCP narrow this request and also provide greater specificity regarding what documents it seeks given that the request potentially calls for any and all documents related to an employee who became employed as a result of a referral. If, through this request, OFCCP is actually soliciting data exports, as opposed to documents, related to the individuals who received referral bonuses (or other compensation resulting from a referral), Oracle requests that the amended request make that clear.

REQUEST FOR PRODUCTION NO. 29:

All DOCUMENTS YOU rely upon or reviewed in making each and every affirmative defense set forth in YOUR ANSWER.

RESPONSE TO REQUEST NO. FOR PRODUCTION 29:

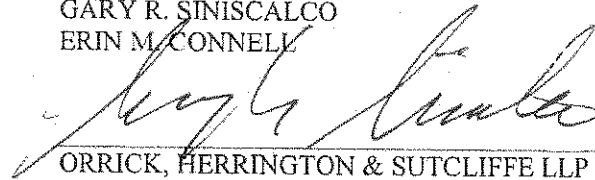
Oracle incorporates by reference its Objections to Specific Definitions set forth above. Due to OFCCP's lack of clarification of limitation, Oracle further objects to this request on the grounds that it is vague and ambiguous, including but not limited to the phrase "rely upon or reviewed." Oracle further objects to this request as overbroad in scope, unduly burdensome, oppressive, and encompassing documents not relevant to any party's claim or defense nor proportional to the needs of the case. Oracle further objects to this request to the extent it seeks information protected by the attorney-client privilege or the attorney work product doctrine.

As noted in separate meet and confer correspondence with OFCCP, Oracle's objections arise from OFCCP's demand for not only all documents Oracle relied upon, but "all documents YOU . . . reviewed" when crafting its affirmative defenses. As written, this request extends to attorney mental impressions and even non-relevant documents by encompassing any and all documents that Oracle's counsel may have reviewed but which were not ultimately relied upon or referenced in Oracle's affirmative defenses. Despite Oracle's request for relevant authority, OFCCP has yet to identify any case or situation where a request for all documents that a party

reviewed in drafting its answer or defenses was deemed permissible under Rule 34, and OFCCP has yet to modify or limit this request in any way.

July 12, 2017

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ORACLE AMERICA, INC.

DEF. ORACLE AMERICA, INC.'S AMENDED & SUPPLEMENTAL RESPONSES TO REQUEST FOR PRODUCTION OF
DOCUMENTS

CASE NO. 2017-OFC-00006

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OHSUSA:767064293.11

PROOF OF SERVICE BY ELECTRONIC MAIL

I am more than eighteen years old and not a party to this action. My business address is Orrick, Herrington & Sutcliffe LLP, The Orrick Building, 405 Howard Street, San Francisco, California 94105-2669. My electronic service address is jkaddah@orrick.com.

On July 12, 2017, I served the interested parties in this action with the following document(s):

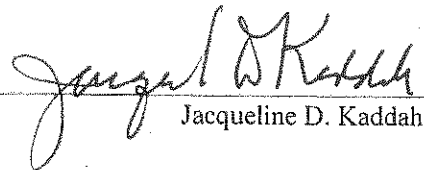
**DEFENDANT ORACLE AMERICA, INC.'S AMENDED & SUPPLEMENTAL RESPONSES
AND OBJECTIONS TO FIRST SET OF REQUESTS FOR THE PRODUCTION OF
DOCUMENTS**

by serving true copies of these documents via electronic mail in Adobe PDF format the documents listed above to the electronic addresses set forth below:

Marc A. Pilotin (pilotin.marc.a@dol.gov)
Laura Bremer (Bremer.Laura@dol.gov)
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Telephone: (415) 625-7769
Fax: (415) 625-7772

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on July 12, 2017, at San Francisco, California.


Jacqueline D. Kaddah

